

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN
COMMUNITY SUPPORT, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, President of the
United
States, in his official capacity, *et al.*,

Defendants.

Case No.: 1:25-cv-38-JL-TSM

**ASSENTED-TO MOTION FOR LEAVE TO FILE BRIEF OF *AMICI CURIAE*
LOCAL GOVERNMENTS AND LOCAL GOVERNMENT OFFICIALS
IN SUPPORT OF PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Katherine Courtney*
Public Rights Project
490 43rd Street, #115
Oakland, CA 94609

Henry Quillen
WHATLEY KALLAS, LLP
159 Middle Street, Suite 2C
Portsmouth, NH 03801

* *pro hac vice forthcoming*

Proposed *Amici Curiae* Local Governments and Local Government Officials move for leave to file an amicus brief in support of Plaintiffs’ motion for preliminary injunction. In furtherance of the motion, Proposed *Amici* state as follows:

1. Proposed *amici* are local governments and local government officials representing 72 jurisdictions across 24 states.

2. They support Plaintiffs’ motion for a preliminary injunction because they, too, will be harmed by the Executive Order that is the subject of Plaintiffs’ lawsuit.

3. This Court “ha[s] discretion to grant amicus curiae status in the exercise of the courts’ inherent authority.” *League of Women Voters of New Hampshire v. Kramer*, No. 24-CV-73-SM-TSM, 2024 WL 4604323, at *1 (D.N.H. Oct. 29, 2024) (granting leave to file memorandum of amicus curiae).

4. The proposed brief will assist the Court in its consideration of the pending motion, because local governments face immediate harms from the Order that overlap yet are distinct from the harms individuals, organizations, and states must confront.

5. Among other things, local governments must manage the administrative confusion that the Order will create. Because many local governments issue birth certificates, they will need to develop new systems to ascertain the citizenship of children born in their local hospitals and within city or county lines.

6. The Order also forces Proposed *Amici* to develop new protocols for any programs requiring citizenship verification, because traditional birth certificates will no longer suffice as proof of citizenship. Local communities will also contend with the personal impact to their community members, such as restrictions on federally funded health care coverage, child services, and educational benefits.

7. Counsel for proposed *amici* have conferred with counsel for the parties. Plaintiffs and Defendants both assent to the request for leave to file.

8. A true and correct copy of the proposed brief has been submitted with this motion.

CONCLUSION

For the foregoing reasons, Proposed Local Government *Amici* respectfully request the Court grant the motion for leave to file the attached brief.

Respectfully submitted,

/s/ Henry C. Quillen

Henry C. Quillen
New Hampshire Bar No. 265420
WHATLEY KALLAS, LLP
159 Middle Street, Suite 2C
Portsmouth, New Hampshire
Tel: (603) 294-1591
Fax: (800) 922-4851
Email: hquillen@whatleykallas.com

Katherine Courtney*
Public Rights Project
490 43rd Street, #115
Oakland, CA 94609
katiec@publicrightsproject.org

** pro hac vice forthcoming*

Dated: January 28, 2025

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was this day served on all counsel via the court's electronic service system.

/s/ Henry C. Quillen

Henry C. Quillen

New Hampshire Bar No. 265420

WHATLEY KALLAS, LLP

Dated: January 28, 2025